

# **Exhibit H**



Jeff Blake <jeff@attorneyzim.com>

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## Re: Black v First Impression - Subpoena to Boomsourcing

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Eric Allen <eric@allenlawyer.com>

Thu, Sep 8, 2022 at 2:33 PM

To: Max Morgan <max.morgan@theweitzfirm.com>, Jeff Blake <jeff@attorneyzim.com>

Cc: Chris Wixom <chris@allenlawyer.com>

Correct - David took that over. I apologize - I thought I emailed you about that. Deal with David on the production going forward.

Eric Allen, Law Partner  
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**From:** Max Morgan [ma\\_morgan@theweitzfirm.com](mailto:ma_morgan@theweitzfirm.com)

**Sent:** Thursday, September 8, 2022 1:31 PM

**To:** Eric Allen [eric@allenlawyer.com](mailto:eric@allenlawyer.com) ; Jeff Blake [jeff@attorneyzim.com](mailto:jeff@attorneyzim.com)

**Cc:** Chris Wixom <[chris@allenlawyer.com](mailto:chris@allenlawyer.com)>

**Subject:** RE Black v First Impression Subpoena to Boomsourcing

Eric

We were contacted by another attorney on this file, David Kamin. He, Jeff and I just called and wanted to confirm that he was handling this matter going forward? Please give me a call at 215.901.8666.

Max

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**From:** Eric Allen <[eric@allenlawyer.com](mailto:eric@allenlawyer.com)>

**Sent:** Friday, July 8, 2022 1:28 PM

**To:** Jeff Blake <[jeff@attorneyzim.com](mailto:jeff@attorneyzim.com)>

**Cc:** Chris Wixom <[chris@allenlawyer.com](mailto:chris@allenlawyer.com)>; Max Morgan <[max.morgan@theweitzfirm.com](mailto:max.morgan@theweitzfirm.com)>

**Subject:** Re: Black v First Impression - Subpoena to Boomsourcing

Jeff, I think the logs can be produced by the 15th, along with some other easier items like contracts, IOs and invoicing. For communications/emails, they have identified roughly 70,000 emails exchanged between Boom & F.I. That isn't astronomical, but we will need to perform a manual review to exclude emails which are irrelevant or privileged, which could take some time,

even if we engage a vendor for that. I'll put together a proposed search-term list next week. Call recordings, if you want them, may be the biggest challenge. They estimate that they have archived roughly 750 million F.I.-related call recordings. They would need to hire a contractor to write special scripting to download all of those, which would be costly and could take several months, if it can be done at all. Do you have time for a call Monday or Tuesday afternoon?

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**From:** Jeff Blake <[jeff@attorneyzim.com](mailto:jeff@attorneyzim.com)>  
**Sent:** Tuesday, July 5, 2022 8:26 AM  
**To:** Eric Allen <[eric@allenlawyer.com](mailto:eric@allenlawyer.com)>  
**Cc:** Chris Wixom <[chris@allenlawyer.com](mailto:chris@allenlawyer.com)>; Max Morgan <[max.morgan@theweitzfirm.com](mailto:max.morgan@theweitzfirm.com)>  
**Subject:** Re: Black v First Impression - Subpoena to Boomsourcing

Eric,

Thanks for the update. The timeline on the production of the call logs and contractual documents seems appropriate. Do you think those items will be produced by or before July 15th?

In response to your proposal for search terms to search emails, I am not against the idea on its face, but I would need to understand the circumstances warranting such a proposal. Are you available tomorrow at 3 pm Central to discuss? We invite you to provide us with terms you propose be searched. That would certainly facilitate discussion. If you'd like some time to provide us with the search terms, we can push the call back to Thursday or Friday at a time that is mutually available.

Thanks,

Jeff

On Tue, Jun 28, 2022 at 1:52 PM Eric Allen <[eric@allenlawyer.com](mailto:eric@allenlawyer.com)> wrote:

Jeff, I spoke with my client and they have already begun the larger call log pull of all F.I.-related logs going back to July 14, 2017. They have also begun searching for all call recordings that may still exist going back to that date. They estimate having the call logs and recordings ready to produce within the next 2 weeks, along with certain other documents, including contracts, invoicing and IOs, and a log column key. The communications, however, will take at least 30 more days to identify and compile, if it can be done at all. We would like to discuss the possibility of negotiating a reasonable email search-term list. Please let me know your thoughts on that, when convenient.

I also have the following requested follow-up information to provide to you CONFIDENTIALLY at this time:

- [REDACTED]
- [REDACTED]
- [REDACTED]

Thank you,

Eric Allen, Law Partner

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**From:** Jeff Blake <[jeff@attorneyzim.com](mailto:jeff@attorneyzim.com)>  
**Sent:** Monday, June 27, 2022 9:47 AM  
**To:** Eric Allen <[eric@allenlawyer.com](mailto:eric@allenlawyer.com)>

**Cc:** Chris Wixom <[chris@allenlawyer.com](mailto:chris@allenlawyer.com)>; Matt Pitts <[matt@allenlawyer.com](mailto:matt@allenlawyer.com)>; Max Morgan <[max.morgan@theweitzfirm.com](mailto:max.morgan@theweitzfirm.com)>

**Subject:** Re: Black v First Impression - Subpoena to Boomsourcing

Thanks, Eric.

On Mon, Jun 27, 2022 at 10:29 AM Eric Allen <[eric@allenlawyer.com](mailto:eric@allenlawyer.com)> wrote:

I appreciate the reminder. I will follow up with my client today and get back to you by tomorrow.

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**From:** Jeff Blake <[jeff@attorneyzim.com](mailto:jeff@attorneyzim.com)>

**Sent:** Monday, June 27, 2022 8:57:27 AM

**To:** Eric Allen <[eric@allenlawyer.com](mailto:eric@allenlawyer.com)>

**Cc:** Chris Wixom <[chris@allenlawyer.com](mailto:chris@allenlawyer.com)>; Matt Pitts <[matt@allenlawyer.com](mailto:matt@allenlawyer.com)>; Max Morgan <[max.morgan@theweitzfirm.com](mailto:max.morgan@theweitzfirm.com)>

**Subject:** Re: Black v First Impression - Subpoena to Boomsourcing

Counsel,

I do not believe I've received a response to my email of June 17. Please acknowledge receipt of the email and attachment and let me know when your client anticipates producing responsive documents.

Thank you,

Jeff

On Fri, Jun 17, 2022 at 3:26 PM Jeff Blake <[jeff@attorneyzim.com](mailto:jeff@attorneyzim.com)> wrote:

Eric, Chris, and Matt,

Attached you will find the agreed confidentiality order entered by the Court in Black v. First Impression Interactive, Inc., No. 1:21-cv-3745 (N.D. Ill.). Please give an update on when you can provide the outstanding documents responsive to the subpoena.

If you have any questions or concerns, please do not hesitate to contact me.

Thanks and have a nice weekend.

Jeff

On Tue, May 17, 2022 at 3:16 PM Jeff Blake <[jeff@attorneyzim.com](mailto:jeff@attorneyzim.com)> wrote:

Thanks, Eric. We'll forward the signed version from the Court when/as entered.

Jeff

On Tue, May 17, 2022 at 3:12 PM Eric Allen <[eric@allenlawyer.com](mailto:eric@allenlawyer.com)> wrote:

This looks fine guys Thanks

Eric Allen, Law Partner

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**From** Eric Allen [eric@allenlawyer.com](mailto:eric@allenlawyer.com)

**Sent:** Friday, May 13, 2022 10:45 AM

**To:** Jeff Blake <[jeff@attorneyzim.com](mailto:jeff@attorneyzim.com)>

**Cc:** Chris Wixom <[chris@allenlawyer.com](mailto:chris@allenlawyer.com)>; Matt Pitts <[matt@allenlawyer.com](mailto:matt@allenlawyer.com)>; Max Morgan  
[ma\\_morgan@theweitzfirm.com](mailto:ma_morgan@theweitzfirm.com)

**Subject:** Re: Black v First Impression - Subpoena to Boomsourcing

Thanks. I will take a look. Have a great weekend,

Eric Allen, Law Partner

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**From:** Jeff Blake <[jeff@attorneyzim.com](mailto:jeff@attorneyzim.com)>  
**Sent:** Friday, May 13, 2022 10:16:02 AM  
**To:** Eric Allen <[eric@allenlawyer.com](mailto:eric@allenlawyer.com)>  
**Cc:** Chris Wixom <[chris@allenlawyer.com](mailto:chris@allenlawyer.com)>; Matt Pitts <[matt@allenlawyer.com](mailto:matt@allenlawyer.com)>; Max Morgan <[max.morgan@theweitzfirm.com](mailto:max.morgan@theweitzfirm.com)>  
**Subject:** Re: Black v First Impression - Subpoena to Boomsourcing

Eric,

Thanks again for speaking with Max and me the other day.

One of the things we discussed was Boom Sourcings' intention to produce additional responsive documents upon entry of a confidentiality order in the case. Attached you will find a confidentiality order we intend to propose be entered. It is based off the model confidentiality order provided by the Court. Redlines show deviations from the model. Please let us know if you have questions or concerns.

Thanks,

Jeff

On Mon, May 9, 2022 at 6:42 PM Jeff Blake <[jeff@attorneyzim.com](mailto:jeff@attorneyzim.com)> wrote:

Eric,

Thanks. I'll call you then.

Jeff

On May 9, 2022, at 5:31 PM, Eric Allen <[eric@allenlawyer.com](mailto:eric@allenlawyer.com)> wrote:

Yes, can you do tomorrow 4pm central (3pm mountain)? If so, just call our office then and ask for me.

Eric Allen, Law Partner

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**From:** Jeff Blake <[jeff@attorneyzim.com](mailto:jeff@attorneyzim.com)>

**Sent:** Monday, May 9, 2022 9:26 AM

**To:** Eric Allen <[eric@allenlawyer.com](mailto:eric@allenlawyer.com)>

**Cc:** Tom Zimmerman <[tom@attorneyzim.com](mailto:tom@attorneyzim.com)>; Chris Wixom <[chris@allenlawyer.com](mailto:chris@allenlawyer.com)>; Matt Pitts <[matt@allenlawyer.com](mailto:matt@allenlawyer.com)>; Max Morgan <[max.morgan@theweitzfirm.com](mailto:max.morgan@theweitzfirm.com)>

**Subject:** Re: Black v First Impression - Subpoena to Boomsourcing

Eric, Chris, and Matt,

Are you available between 1 and 5 pm Central tomorrow to discuss the Boom Sourcing subpoena response?

Thanks,

Jeff Blake

On Fri, Apr 8, 2022 at 12:37 PM Eric Allen <[eric@allenlawyer.com](mailto:eric@allenlawyer.com)> wrote:

Tom, we should have documents from the client today - logs and the like. We just need time to review them today and tomorrow and get them to you. Can we have Monday on this response? Appreciated.

Eric Allen, Law Partner

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**From:** Tom Zimmerman <[tom@attorneyzim.com](mailto:tom@attorneyzim.com)>  
**Sent:** Thursday, March 24, 2022 3:06 PM  
**To:** Chris Wixom <[chris@allenlawyer.com](mailto:chris@allenlawyer.com)>  
**Cc:** Eric Allen <[eric@allenlawyer.com](mailto:eric@allenlawyer.com)>; Blake Jeff <[jeff@attorneyzim.com](mailto:jeff@attorneyzim.com)>  
**Subject:** Re: Black v First Impression - Subpoena to Boomsourcing

Agreed.

Tom Zimmerman

On Mar 24, 2022, at 4:01 PM, Chris Wixom <[chris@allenlawyer.com](mailto:chris@allenlawyer.com)> wrote:

Mr. Zimmerman,

My office represents Boomsourcing and has been working on reviewing and compiling the information and documents requested in your subpoena served on February 25, 2022. Attorney Eric Allen has been ill this last week and an extension of two weeks would be greatly appreciated. Please confirm if this is fine with you. I have attached a copy of the subpoena for reference.

Thank you,

Chris Wixom, Paralegal and Director of Licensing  
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